

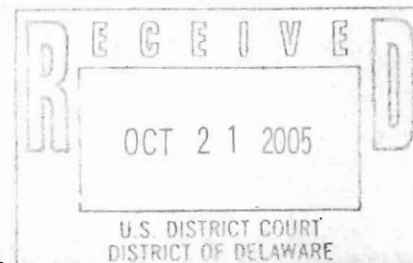
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,

v.

DR. SYLVIA FOSTER, STAFF
MEMBERS, THE DELAWARE
PSYCHIATRIC CENTER AND
MR. GREY,

CA. NO. 04-1350(GMS)



AFFIDAVIT IN SUPPORT OF PLAINTIFF'S MOTION
FOR THE APPOINTMENT OF COUNSEL

COMES NOW, THE PLAINTIFF JIMMIE LEWIS, PRO-SE,
AFFIDAVIT IN SUPPORT OF MOTION FOR THE APPOINTMENT
OF COUNSEL, IN SUPPORT THEREOF ASSERT THE FOLLOWING:

- 1.) I AM THE PLAINTIFF IN THE ABOVE CAPTIONED CASE.
I MAKE THIS AFFIDAVIT IN SUPPORT OF MOTION FOR
THE APPOINTMENT OF COUNSEL.
- 2.) THIS IS A CIVIL ACTION CASE FILED UNDER 42 U.S.C. § 1983
BY A LITIGANT WHO'S COMPLAINT CLAIMS THE DEFENDANTS
COMMITTED NUMEROUS STATUTORY AND CONSTITUTIONAL VIOLATIONS
AGAINST HIM WHILE BEING HOUSED AT THE DELAWARE PSYCHIATRIC
CENTER, BY PSYCHIATRIST, PSYCHOLOGIST, PHYSICIANS, NURSES,
NURSE ASSISTANTS, SOCIAL WORKER, AND ADMINISTRATORS.
THE PLAINTIFF SEEKS DAMAGES FOR ALL CLAIMS, AND A
PRELIMINARY INJUNCTION TO ENSURE PROPER PSYCHOLOGICAL TREATMENT,
MEDICAL TREATMENT AND TO INFORM THE SUPERIOR COURT OF
SAID VIOLATIONS.

- 3.) THIS IS A COMPLEX CASE BECAUSE IT CONTAINS SEVERAL DIFFERENT LEGAL CLAIMS INVOLVING MORE THAN (20) DIFFERENT DEFENDANTS.
- 4.) THIS CASE INVOLVES MEDICAL ISSUES THAT VERY WELL MAY REQUIRE COMPLEX EXPERT TESTIMONY.
- 5.) THE PLAINTIFF IS PRESENTLY INCARCERATED IN THE ADMINISTRATIVE SEGREGATION (S.H.U) SECURITY HOUSING UNIT, AND HAS VERY LIMITED ACCESS TO LEGAL MATERIAL. I MUST SUBMIT WRITTEN REQUEST FOR SPECIFIC MATERIALS, HOWEVER, I CANT EFFECTIVELY DO SO BECAUSE I LACK ACCESS TO THE VERY LEGAL MATERIAL THAT WOULD ADVISE ME OF EXACTLY WHAT LEGAL MATERIAL I NEED, THIS OPPRESSES ME FROM PROPERLY PETITIONING TO THE COURT.
- 6.) THIS CASE WILL REQUIRE DISCOVERY OF DOCUMENTS AND DEPOSITION(S) OF A NUMBER OF DEFENDANTS AND WITNESSES, BUT THE PLAINTIFF DOES NOT HAVE THE ABILITY TO INVESTIGATE DISCOVERY DOCUMENTS, TO READILY PREPARE MYSELF TO CONDUCT DEPOSITION HEARING, OR TO GATHER AFFIDAVITS FROM DEFENDANTS AND OR WITNESSES.
- 7.) THE PLAINTIFF IS INDIGENT, AND CAN NOT AFFORD TO RETAIN AN ATTORNEY, EXPERT WITNESS(ES) OR AN INVESTIGATOR.
- 8.) THE PLAINTIFF IS PRESENTLY PRESCRIBED 400 MG'S OF THE PSYCHOTROPIC MEDICATION "SEROQUEL", IN WHICH VERY WELL MAY INTERFERE WITH MY ABILITY TO PROPERLY ADHERE TO THE COURT PROCEDURES.

9.) THE PLAINTIFF HAS ONLY BEEN CERTIFIED WITH
A HIGH SCHOOL EDUCATION, AND NO LEGAL
EDUCATIONAL TRAINING.

DATE: 10/10/05

Jimmie Lewis
SBI # 506622
DEL. CORR. CENTER
1181 PADDOCK RD
SMYRNA, DE 19977

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FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,

v.

CA. NO 04 - 1350 (GMS)

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PSYCHIATRIC CENTER AND
MR. GREY,

CERTIFICATE OF SERVICE

I, THE UNDERSIGNED, DO HEREBY CERTIFY ON THIS 10TH DAY
OF OCT, 2005, THAT (2) TWO TRUE AND CORRECT COPIES OF
PLAINTIFF'S JIMMIE LEWIS, AFFIDAVIT IN SUPPORT OF
PLAINTIFFS MOTION FOR APPOINTMENT OF COUNSEL,
HAS BEEN SERVED BY U.S. MAIL TO THE FOLLOWING :

CYNTHIA G. BEAM ESQ # ~~2004~~
STATE BAR I.D # 2565
1001 JEFFERSON PLAZA, SUITE 202
WILMINGTON, DELAWARE 19801
ATTORNEY FOR DEFENDANT(S),
DR. SYLVIA FOSTER AND
THE DELAWARE PSYCHIATRIC
CENTER.

Jimmie Lewis
SBI #506622
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PHÉBE S. YOUNG #1043
DEPUTY ATTORNEY GENERAL
820 N. FRENCH ST, 6TH FLOOR
WILMINGTON, DE 19801
ATTORNEY FOR DEFENDANT(S)
ROBERT N. GRAY (MR. GREY),
AND THE DELAWARE PSYCHIATRIC
CENTER.

Jimmie Lewis
SBI # 506622
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JUDGE GREGORY M. SLEET
UNITED STATES DISTRICT COURT
J. CALEB BOGGS FEDERAL BUILDING
844 . N. / KING ST, LOCK BOX 19
WILMINGTON, DE 19801

DATE: 10/10/05

Jimmie Lewis
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SMYRNA, DE 19977